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Attorneys for Debtor in Possession

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

IN RE

2<sup>ND</sup> CHANCE INVESTMENT GROUP, LLC,

Debtor and Debtor in Possession.

Case No. 8:22-bk-12142-SC

Chapter 11

**STIPULATION RESOLVING  
OBJECTIONS BY LANTZMAN  
INVESTMENTS, INC., AND LMF2 LP  
TO THE DEBTOR’S DISCLOSURE  
STATEMENT AND PLAN (ECF  
NUMBERS 140, 139)**

**Hearing Information**

Date: July 18, 2023

Time: 1:30 pm

Place: United States Bankruptcy Court  
411 West Fourth Street, Suite 5130 /  
Courtroom 5C (via zoom)  
Santa Ana, CA 92701-4593

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY**

**JUDGE; THE UNITED STATES TRUSTEE; AND PARTIES IN INTEREST HEREIN:**

This Stipulation Resolving Objections by Lantzman Investments, Inc., and LMF2 LP to  
the Debtor’s Disclosure Statement and Plan (ECF Numbers 140, 139) (the “Stipulation”) is  
entered into by and between 2<sup>nd</sup> Chance Investment Group, Lantzman Investments, Inc., and  
LMF2 LP, by and through their respective attorneys of record (together known as the “Parties”).

**RECITALS**

2<sup>nd</sup> Chance Investment Group, LLC is the debtor and debtor in possession (“Debtor”) in the above-captioned Chapter 11 bankruptcy case (“Case”). On December 21, 2022 (“Petition Date”), the Debtor commenced the Case by filing a voluntary petition under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (“Bankruptcy Code”) or “Code”). The Debtor filed its Chapter 11 Liquidating Plan Dated May 10, 2023, as ECF No. 139 (“Plan”). The Debtor filed its Disclosure Statement Describing Chapter 11 Liquidating Plan Dated May 10, 2023, as ECF No. 140 (“Disclosure Statement”). Lantzman Investments, Inc., and LMF2 LP (“Secured Creditors”) filed their joint objections to the Debtor’s Disclosure Statement on July 5, 2023, as ECF No. 191 (“Objections”). Debtor filed its response to the Objections on July 12, 2023, as ECF No. 192 (“Response”). A hearing on the adequacy of the Debtor’s Disclosure Statement is scheduled to be heard on July 19, 2023, at 1:30 pm in Courtroom 5C (Virtual).

The Parties, through their counsel, have met and conferred to resolve the Objections and agree to the following:

**THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:**

1. Either the order approving the adequacy of the Disclosure Statement and an order confirming the Plan will include the following language, or alternatively, the Disclosure Statement and Plan will be amended to reflect that:
  - a. The transfer of bankruptcy estate property to the liquidating trust shall be subject to all existing liens, claims and interests.
  - b. The liquidating trustee will pay the proceeds of any sale of property post-confirmation to all holders of valid liens, claims and interests at the time of the closing of the sale.

1 c. If the liquidating trustee intends to treat a lien, claim, or interest as disputed, he will  
2 notify the claimant of the dispute and withhold funds for that lien, claim or interest,  
3 plus sufficient funds to pay any accrued interest and attorneys fees that may accrue  
4 during the dispute, and to which the Secured Creditors would be entitled under their  
5 notes and deeds of trust, in a segregated account until the dispute is resolved. Once  
6 the dispute is resolved, the liquidating trustee will pay the allowed or stipulated  
7 amount to the holder of a dispute lien, claim or interest.

8 2. The Objections by the Secured Creditors are resolved and hereby withdrawn.

9  
10 IT IS SO STIPULATED.

11 DATED: July 18, 2023

SULLIVAN HILL REZ & ENGEL, APLC

12 By:  /s/ Kathleen A. Cashman-Kramer

Gary Rudolph

Kathleen A. Cashman-Kramer

Attorneys for Secured Creditors

Lantzman Investments, Inc. and LMF2 LP

15 Dated: July 18, 2023

Respectfully Submitted,

17 /s/ Andy C. Warshaw

18 Andy C. Warshaw, Esq.

Attorneys for Debtor in Possession

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Irvine, CA 92614